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10 UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF WASHINGTON

11 In Re:

No. 18-03197-11

12 GIGA WATT, INC.,

**STIPULATED ORDER PRESERVING
PRIVILEGE PURSUANT TO FRE 502(d)**

13 Debtor.

14 Based on the stipulation of the parties filed on September 11, 2020 (ECF
15 No. 706), and pursuant to Federal Rule of Evidence 502(d), the Court hereby ORDERS
16 as follows:
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18 Any production of documents and/or provision of information by Perkins Coie
19 LLP in this matter to the Chapter 11 Trustee in the above-captioned case (the
20 “Trustee”) or his counsel does not and shall not constitute a waiver of the attorney-
21 client privilege or any other privilege or protection that applies or may apply to such
22 documents or information, both as to any documents or information produced to the
23 Trustee and as to any other documents or information subject to a claim of privilege in
24 Perkins Coie LLP’s possession, whether in this proceeding or in any other federal or
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STIPULATED ORDER PRESERVING PRIVILEGE
PURSUANT TO FRE 502(d) - 1

BYRNES ♦ KELLER ♦ CROMWELL LLP
38TH FLOOR
1000 SECOND AVENUE
SEATTLE, WASHINGTON 98104
(206) 622-2000

1 state proceeding. Perkins Coie LLP may make any such production to the Trustee
2 pursuant to this Court's "Order Regarding Production of Documents Responsive to
3 Rule 2004 Order and Placing Limits on the Use of Confidential Information in Such
4 Documents." ECF No. 673.

6 IT IS SO ORDERED.

8 ///END OF ORDER///

9 Presented by:

10 BYRNES KELLER CROMWELL LLP

POTOMAC LAW GROUP

11 By /s/ Bradley S. Keller

By /s/ Pamela M. Egan

12 Bradley S. Keller, WSBA #10665

Pamela M Egan, WSBA #54736

13 By /s/ Ralph E. Cromwell, Jr.

1905 7th Avenue W.

14 Ralph E. Cromwell, Jr., WSBA #11784

Seattle, Washington 98119

15 1000 Second Avenue, 38th Floor

415-297-0132

16 Seattle, Washington 98104

Email: pegan@potomaclaw.com

17 206-622-2000

Attorneys for Chapter 11 Trustee Mark

18 Fax: 206-622-2522

D. Waldron

19 Email: bkeller@byrneskeller.com

20 rcromwell@byrneskeller.com

21 *Attorneys for Perkins Coie LLP*

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STIPULATED ORDER PRESERVING PRIVILEGE
PURSUANT TO FRE 502(d) - 2

BYRNES ♦ KELLER ♦ CROMWELL LLP
38TH FLOOR
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SEATTLE, WASHINGTON 98104
(206) 622-2000

1 **CERTIFICATE OF SERVICE**

2 I hereby certify that on this 11th day of September, 2020, I electronically filed
3 the foregoing with the Clerk of the Court using the CM/ECF System, which in turn
4 automatically generated a Notice of Electronic Filing (NEF) to all parties in the case
5 who are registered users of the CM/ECF system. The NEF for the foregoing
6 specifically identifies recipients of electronic notice.

7 By /s/ Ralph E. Cromwell, Jr.

8 Ralph E. Cromwell, Jr.

9 *Attorneys for Plaintiffs*

10 1000 Second Avenue, 38th Floor

11 Seattle, Washington 98104

12 206-622-2000

13 Fax: 206-622-2522

14 Email: rcromwell@byrneskeller.com

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STIPULATED ORDER PRESERVING PRIVILEGE
PURSUANT TO FRE 502(d) - 3

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